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18 Attorneys for Defendants
19 CHICAGO TITLE INSURANCE COMPANY and CHICAGO
20 TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WILMINGTON TRUST, NATIONAL
ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00406-JAD-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and
Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively “Defendants”) and plaintiff
Wilmington Trust, National Association (“Wilmington”), by and through their respective
attorneys of record, which hereby agree and stipulate as follows:

1 1. On March 10, 2021 Wilmington filed its complaint in the Eighth Judicial District
2 Court for the State of Nevada;

3 2. On March 10, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Chicago Agency's response to Wilmington's complaint is currently due on April
6 14, 2021, while Chicago Title's response is due on April 16, 2021;

7 4. Counsel for Defendants request a 31-day extension for Chicago Title (33 days for
8 Chicago Agency) through and including Monday, May 17, 2021 for Defendants to file their
9 respective responses to Wilmington's complaint to afford Defendants' counsel additional time to
10 review and respond to Wilmington's complaint.

11 5. Counsel for Wilmington does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Monday, May 17, 2021.

3 Dated: April 11, 2021

SINCLAIR BRAUN LLP

5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 CHICAGO TITLE INSURANCE
9 COMPANY, and CHICAGO TITLE OF
10 NEVADA, INC.

11 Dated: April 11, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Darren T. Brenner

13 DARREN T. BRENNER
14 Attorneys for Plaintiff
15 WILMINGTON TRUST, NATIONAL
16 ASSOCIATION

17 **IT IS SO ORDERED.**

18 Dated this 13th day of April, 2021.

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20 CAM FARENBACH
21 UNITED STATES MAGISTRATE JUDGE
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